



3.0 Privacy Policy

1.0 Purpose

This policy seeks to ensure the privacy and appropriate management of personal information collected by Acacia Therapy.

This Policy outlines the type of personal information that is collected by Acacia therapy, how it will be managed and used, how clients can access their personal information, and the tools used to manage information collected by Acacia Therapy. In addition, the Policy outlines responsibilities for the management of personal data.

Acacia Therapy is committed to ensuring all reasonable steps are in place to protect personal information for misuse, interference or loss; and from unauthorised access, modification or disclosure as outlined by the Privacy Act 1988 (The Act).

2.0 Scope

This Policy applies to all employees and contractors of Acacia Therapy.

3.0 Policy Objectives

The objectives of this policy are to:

- Provide a consistent approach to the collection, recording, retrieval and storage of personal information;
- Ensure staff understand the importance of protecting client data and information;
- Provide transparency as to how Acacia Therapy will manage, share and store client information;
- Ensure that the business is equipped to manage client's information in a manner that is identifiable, accurately reported, current and confidential.

4.0 Content



4.1 What is personal information?

Personal information is **information** that is associated with an identifiable individual. It can include correspondence, written documents, reports, audio, images, alpha-numerical identifiers and any combination of these. Information does not have to be true to be considered personal information.

4.2 Information collected by Acacia Therapy

Acacia Therapy may collect the following types of personal information relating to clients, their families and involved stakeholders:

- Name;
- Address;
- Phone number;
- Fax number;
- Email address;
- Information from enquiries you have made to Acacia Therapy;
- Diagnosis / test results / treatments information;
- Family history and contact details
- NDIS, Medicare and other governing registration details
- Details of communications between us and other providers relating to your health care needs and health conditions.

Acacia Therapy will only request and retain personal information that is necessary to:

- provide safe and responsive support;
- monitor the supports provided; and
- fulfil contractual and other requirements to provide non-identifying data and statistical information to government agencies.

4.3 Method of information collection:

Information is collected in a number of ways by Acacia Therapy, including electronically (text, emails and forms), in person, during phone calls and through the Acacia Therapy website. This information may be stored and used by Acacia Therapy in ways outlined by this Policy.

4.4 Third party agents:

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances Acacia Therapy may be provided with information by third parties (such as other disability services or health agencies). In these cases we will take reasonable steps to ensure that you are made aware of



the information that has been provided to us by the third party.

4.5 Use of collected personal information:

The information collected by Acacia Therapy is used in the provision of allied health services, improvement of its service delivery model, billing and for statistical purposes.

Acacia Therapy does not provide any personal information to third parties, except where required by law or in agreement with the client or their representative. This will be achieved through a documented *Consent to Obtain and Release Information Agreement* between the client, or their representative, and Acacia Therapy.

Please refer to Section 4.7 Access to personal information for further guidance.

4.6 Security and access to personal information:

Acacia Therapy will take all reasonable steps to protect the personal information of clients and customers. However, the Acacia Therapy is not liable for any unauthorised access to this information.

Staff will ensure that personal information is handled in an appropriate manner and saved to Acacia Therapy's client management system to avoid loss or unauthorised access. Hard copy documents will be stored in an appropriate lockable device when not in use. Access to personal information will be limited to staff that require access for a legitimate reason.

Information not required to be retained by law will be destroyed by shredding or where in the case of a soft copy, deleted.

Acacia Therapy utilises cloud computing for storing client records, treatment notes, signed documents and contact details. Acacia Therapy, where possible, has a preference for the use of Australian based servers to ensure commonality of Privacy Law and the use of high-quality security protocols. Cloud computing software meeting the requirements of ISO27018 will be used where possible.

Devices that have access to corporate data will be protected through encryption, password access, and multifactor authentication (where available).

4.7 Access to personal information:

Clients can request a copy of their personal information stored by Acacia Therapy or request the updating of their personal information by emailing



info@acaciatherapy.net or writing to the Director Acacia Therapy at Po Box 260 Harlaxton Toowoomba, 4350, Queensland.

If clients, or other entities, are seeking to access health or personal information, verified evidence of correct identity must be provided such as:

- Passport
- Driver's licence
- Signed and witnessed Consent to Share Information agreement, or other such document.
- Or in person at the clinic or place of service.

If the information cannot be provided under the general administrative process outlined above, a request can be made under the *Information Privacy Act 2009 (QLD)*.

Where a request is made to access personal information relating to a minor or someone who requires support for decision-making, the person making the request must provide evidence of legal authority to make such request.

Acacia Therapy will aim to address all requests to access or correct information within ten (10) business days.

5.0 Responsibilities

Everyone within the organisation has a responsibility for the protection and management of client and customer data, and information collected by Acacia Therapy. Wide awareness and attention to the provisions outlined by this Policy will help to ensure that this policy is working effectively, and deeply integrated into our practices and culture.

All employees and contractors must comply with the following guidelines when undertaking work on the behalf of Acacia Therapy:

- Understand the contents of this policy and their area of responsibility;
- Comply with appropriate controls within their areas of responsibility;
- Maintain an open and honest approach to privacy protection within their area of responsibility and broadly across the organisation;
- Undertake risk assessments and implement controls to protect privacy and access to client information;
- Reduce risk of data loss and breach of privacy;

- Report issues relating to privacy through effective communication with team members;
- Be proactive and engaged in the management of data privacy and protection.

Management is responsible for:

- Providing leadership and direction in the practice of privacy management;
- Foster a culture of proactive privacy management;
- Ensuring that business, financial, workplace health, client privacy and safety, and risk management approaches are integrated and used to inform business decision making;
- Providing staff with the resources, technology, training to allow them to protect and manage client privacy
- Encourage openness and honesty in the reporting and escalation of issues relating to privacy management and cases of privacy breaches;
- Ensure that staff and contractors are provided with the opportunity to develop the skills required to apply this Policy;
- Implement the Policy and monitor its success;
- Ensure that the objectives of this policy are achieved;
- Ensure that plans and procedures are in place to management privacy; and
- Ensure that business activities comply with relevant laws and regulations.

Employees and contractors are responsible for:

- Following all procedures and policies outlined by Acacia Therapy in the management and protection of client privacy;
- Identify risks to client privacy and report to management for investigation and action;
- Undertake regular reviews of business activities, data collection / management and the performance of privacy protection devices and procedures; and
- Have a proactive, adaptive and responsible mindset to the protection and appropriate management of client data.

6.0 Integration

Client and customer information management and therefore privacy is a key business process that shall be embedded in Acacia Therapy's practices, activities, culture and decision-making.



Acacia Therapy is committed to monitoring and updating this Policy and its supporting processes to ensure best practice is achieved and compliance with relevant legislation.

Audits will be undertaken to ensure adherence to this Policy

7.0 Relevant Law and regulations

Information Privacy Act 2009 (QLD)

Privacy Act 1988

8.0 Related Policies and documents

Consent to Obtain and Release Information Agreement

9.0 Definitions

Term	Definition
Compliance	Ensuring that the requirements of laws, regulations, industry codes and organisational policies and procedures are met (AS/NZS ISO 31000:2009).
Personal information	Personal information is information that is associated with an identifiable living individual. It can include correspondence, written documents, reports, audio, images, alpha-numerical identifiers and any combination of these. Information does not have to be true to be personal information.
Third party	A third person or organization less directly involved in a matter than the main people or organizations that are involved in the matter.

10.0 Policy Details

Policy Category	Privacy Policy
Date Adopted	29/11/2019
Endorsed by	Louise Edwards
Effective Date	29/11/2019
Policy Version Number	V2
Review date	29/11/2020

11.0 Revision History

Policy Version	Approved Date	Reviewed by	Approved by
V2	12/11/2019	Callum Edwards	Louise Edwards

12.0 Reference:

1. Office of the Information Commissioner Queensland 2019

<https://www.oic.qld.gov.au/guidelines/for-government/access-and-amendment/introduction-to-the-acts/what-is-personal-information>